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November 14, 2024

**VIA ECF**

Hon. James R. Cho, U.S.M.J.  
United States District Court Eastern District of New York  
225 Cadman Plaza East, Courtroom 11D South  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, et al.**  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**

Dear Judge Cho:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case. Plaintiff submits this letter jointly with Defendants and non-parties IME Legal Reps and Eugene Liddie in compliance with the Court's October 24, 2024 Order requiring the parties to submit a joint letter regarding the status of Plaintiff's motion to compel (ECF Docket Entry 385).

Defendants produced documents today and Plaintiff will need time to review same to determine whether they are sufficient. Moreover, Plaintiff has met and conferred with non-parties IME Legal Reps and Eugene Liddie regarding specific transactions that it requests they produce without redactions. Counsel for IME Legal Reps and Eugene Liddie indicated that she will discuss same with her clients. The parties and IME Legal Reps and Eugene Liddie have agreed to conduct a further meet and confer on November 20 at 4:30 pm. Therefore, the parties and IME Legal Reps and Eugene Liddie respectfully request that the Court extend their time to provide the Court with a more substantive update on or before November 22, 2024.

Dated: Lake Success, New York  
November 14, 2024

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York  
November 14, 2024

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF)